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April 4, 2013

By E-Mail

The Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl Street, Room 2210
New York, New York 10007

APR 4 2013

Re: *United States v. Daugerdas, et ano.*, S5 09 Cr. 581 (WHP)

Dear Judge Pauley:

We write on behalf of defendant Paul Daugerdas in the above-referenced matter. We respectfully request that the Court grant an enlargement of time for the filing of Mr. Daugerdas's reply brief to the Government's opposition of his Rule 29 motions. Previously, the Court approved a schedule in which the reply brief was to be filed by Friday, April 5, 2013. Last Friday, the Government filed a voluminous 44-page brief in response to the Defendants' Rule 29 and severance motions. In order to respond succinctly and pointedly with appropriate references to the lengthy trial record, we respectfully seek a one-week enlargement of time to file our reply on or before April 12, 2013.

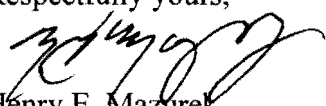
We conferred with Sharon McCarthy, Esq., on behalf of defendant Denis Field, and she joins in our request. We also conferred with Assistant United States Attorney Stanley J. Okula, Jr., who on behalf of the Government, has no objection to this proposal. This is the first request by the parties for an adjustment of the post-trial motions schedule. It also will have no effect on the scheduled date for oral argument on the motions, which is currently scheduled for May 17, 2013, at 2 p.m.

Thank you for your consideration of this request.

Application granted.

SO ORDERED:

Respectfully yours,


Henry E. Mazurek
Brian D. Linder


cc: All Government and Defense Counsel